Cont'd
Cl 4

wherein said first formatted account information comprises formatted information for said original printed account statement.

REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-4, 6-12, 14-18, and 20 are presently active. Claims 5, 13, and 19 have been cancelled without prejudice; and Claims 1, 4, 9, and 15 have been amended by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claims 1-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,249,770 to Erwin et al. (hereinafter "the '770 patent").

First, Applicants note that the rejections of Claims 5, 13, and 19 are rendered moot by the cancellation of those claims.

Amended Claim 1 is directed to a method comprising, *inter alia*, the steps of: (1) formatting first formatted account information into second formatted account information; (2) storing the second formatted account information in a storage area; and (3) transferring the second formatted account information from the storage area to a display device for displaying the second formatted account information in a format that appears identical in all material aspects to an original printed account statement, without storing graphical images of the original printed account statement. Further, the first formatted account information comprises formatted information for the printed account statement. Claim 1 has been amended to clarify that the second formatted account information is displayed in a format

-4-

that appears identical in all material aspects to an original printed account statement, without storing graphical images of the original printed account statement. The amendment to Claim 1 is supported by the originally filed specification and does not add new matter.[2]

The '770 patent is directed to a method and system for automatically analyzing historical financial statements and generating financial forecasts. Regarding the rejection of Claim 1 under 35 U.S.C. § 103, the Office Action states that the '770 patent teaches everything in Claim 1 with the exception of the above-noted formatting and transferring steps, and indicates that those steps would have been obvious to one of ordinary skill in the art.

In the outstanding Office Action, the stated motivation for modifying the '770 patent to include the claimed formatting and transferring steps is to "store account information that can be made available for retrieval on-line by display and periodic printing or mailing of statements."[3] However, Applicants submit that the Office Action is simply stating perceived advantages of Applicants' invention as motivation to modify the '770 patent, without identifying that, absent Applicants' specification, one of ordinary skill in the art would have even thought to address the problem. Such hindsight reconstruction of Applicants' invention cannot be used to establish a *prima facie* case of obviousness.

Moreover, Applicants respectfully submit that the rejection of Claim 1 (and dependent Claims 2-4 and 6-8) is rendered moot by the present amendment to Claim 1. The '770 patent neither discloses nor suggests the limitations added to amended Claim 1, namely that the second formatted account information is displayed in a format that appears identical in all material aspects to an original printed account statement, without storing graphical

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[2]See, e.g., page 4 of the specification.

[3]Office Action of August 5, 2002, at page 3, lines 10 and 11.

images of the original printed account statement. Further, Applicants submit that there is no evidence of record to indicate that one of ordinary skill would have been motivated to modify the '770 patent to obtain the invention of amended Claim 1.
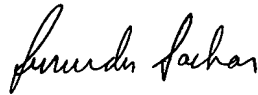
Amended Claims 9 and 15, directed to a system and a computer program product, respectively, recite limitations analogous to the limitations recited in amended Claim 1. Note that Claims 9 and 15 have been amended to recite that the second formatted account information is displayed in a format that appears identical in all material aspects to an original printed account statement, without storing graphical images of the original printed account statement. Thus, for the reasons stated above for the patentability of Claim 1, Applicants respectfully traverse the rejection of Claims 9 and 15 (and associated dependent claims) as being obvious in light of the teachings of the '770 patent.

Thus, it is respectfully submitted that independent Claim 1 (and dependent Claims 2-4 and 6-8), independent Claim 9 (and dependent Claims 10-12 and 14), and independent Claim 15 (and dependent Claims 16-18 and 20) patentably define over the '770 patent.

Consequently, in view of the present amendment and in light of the above discussions, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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IN THE CLAIMS

Please cancel Claims 5, 13, and 19 without prejudice.

Please amend Claims 1, 4, 9, and 15 as follows:

1. (Amended) A method comprising the steps of:

formatting first formatted account information into second formatted account information;

storing said second formatted account information in a storage area, without storing graphical images of an original printed account statement;

interactively inputting a request for said second formatted account information; and

transferring said second formatted account information from said storage area to a display device for displaying said second formatted account information in a format that appears identical in all material aspects to the original printed account statement,

wherein said first formatted account information comprises formatted information for [a] said original printed account statement.

4. (Amended) The method according to [Claim] claim 1, wherein said step of interactively inputting comprises one of:

interactively inputting, by a first customer of a first business, a request for said second formatted account information by using a graphical user interface,

-8-

interactively inputting, by a software agent of a second customer of a second

business, a request for said second formatted account information by using a

graphical user interface,

interactively inputting, by a first member of a first organization, a request for

said second formatted account information by using a graphical user interface, and

interactively inputting, by a software agent of a second member of a second

organization, a request for said second formatted account information by using a

graphical user interface.

9. (Amended) A system comprising:

a formatting device configured to format first formatted account information into

second formatted account information;

a storing device configured to store said second formatted account information in a

storage area, without storing graphical images of an original printed account statement;

an input device configured to interactively input a request for said second formatted

account information; and

a transferring device configured to transfer said second formatted account information

from said storage area to a display device for displaying said second formatted account

information in a format that appears identical in all material aspects to the original printed

account statement,

wherein said first formatted account information comprises formatted information for

[a] said original printed account statement.

15. (Amended) A computer program product including a computer readable medium embodying program instructions for causing a system to perform the steps of:

formatting first formatted account information into second formatted account information;

storing said second formatted account information in a storage area, without storing graphical images of an original printed account statement;

interactively inputting a request for said second formatted account information; and

transferring said second formatted account information from said storage area to a display device for displaying said second formatted account information in a format that appears identical in all material aspects to the original printed account statement,

wherein said first formatted account information comprises formatted information for [a] said original printed account statement.